

Exhibit 2

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation; MOZILLA
FOUNDATION, a California public benefit
corporation; LAURA CHAMBERS and her marital
community; WINIFRED MITCHELL BAKER and
her marital community, and DANI CHEHAK and
her marital community.

Defendants.

Case No. 2:24-cv-1032

**DEFENDANT LAURA CHAMBERS'
RESPONSES TO PLAINTIFF'S
FIRST SET OF
INTERROGATORIES AND
REQUESTS FOR PRODUCTION**

TO: Plaintiff Steve Teixeira

AND TO: Plaintiff's Counsel of Record

Defendant Laura Chambers ("Defendant"), by and through their counsel of record, hereby responds to Plaintiff Steve Teixeira ("Plaintiff") First Set of Interrogatories and Requests for Production to Defendant Laura Chambers as follows:

GENERAL OBJECTIONS AND DEFINITIONS

The following General Objections shall be considered as made, to the extent applicable, in response to each of the Interrogatories and Requests, as if the General Objections were fully set forth in each such response, including those responses which also set forth specific objections.

1. Defendant objects to each Interrogatory and Request to the extent that it seeks to

1 impose obligations beyond those set forth by the Federal Rules of Civil Procedure.

2 2. Defendant objects to each Interrogatory and Request to the extent that it calls for
 3 the production of documents or information containing trade secrets, proprietary information,
 4 confidential information and other competitively sensitive business or commercial information.

5 3. Defendant objects to each Interrogatory and Request to the extent that it seeks
 6 privileged documents or privileged information, including, without limitation, documents or
 7 information that were prepared, generated, or received for or in anticipation of litigation,
 8 documents or information that constitute attorney work product, or documents or information that
 9 is protected by a claim of privilege or immunity, including, without limitation, the attorney-client
 10 privilege, common interest or joint defense privilege, or any other applicable privilege or
 11 immunity. Such documents or information shall not be provided in response hereto, and
 12 inadvertent disclosure shall not be deemed a waiver of any privilege, immunity or protection.

13 4. Defendant objects to each Interrogatory and Request to the extent it is vague,
 14 ambiguous, compound, or does not describe the information sought with sufficient particularity.

15 5. Defendant's responses to Plaintiff's Interrogatories and Requests are based on
 16 information presently available to Defendant. Defendant reserves the right to supplement and/or
 17 amend these responses or to supply additional documents at a later time, if further information
 18 becomes available in the course of Defendant's diligent inquiries, through discovery or otherwise.
 19 These responses should not be construed as, and do not constitute a waiver of, Defendant's rights
 20 to prove additional facts at trial.

21 6. Defendant objects to each Interrogatory and Request to the extent it is unduly
 22 burdensome, oppressive, or harassing.

23 7. Defendant objects to each Interrogatory and Request to the extent that it is overly
 24 broad and not limited in time or scope.

25 8. To the extent that Defendant states that it will identify or produce documents
 26 responsive to the Requests, this is an indication that Defendant has used reasonable diligence to
 locate the requested documents it believes, in the exercise of reasonable business and technological

1 usage, are relevant, responsive, and non-privileged. To the extent Plaintiff required Defendant to
 2 do more than the foregoing, Defendant objects to each and every Request on the ground that it
 3 would subject Defendant to oppression, harassment, and undue burden.

4 **ANSWER TO INTERROGATORIES**

5 **INTERROGATORY NO. 1:** Identify all accounts including, but not limited to, email addresses,
 6 social media, phone numbers, blogs, etc, where you have communicated with or about Plaintiff.

7 **ANSWER TO INTERROGATORY NO. 1:**

8 Defendant objects to this Interrogatory on the grounds that it seeks information protected
 9 by the attorney-client privilege, work-product doctrine, and/or other applicable privileges.
 10 Defendant objects to this Interrogatory on the grounds that it seeks documents containing
 11 information pertaining to individuals, the disclosure of which would constitute a violation of any
 12 individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any
 13 other constitutional, statutory, or common law right of privacy. Defendant also objects to this
 14 Interrogatory as overly broad, unduly burdensome, and not reasonably tailored or proportional to
 15 the needs of this case insofar as it seeks information that is not relevant to any party's claims or
 16 defenses. Without waiving the objections, Defendant responds as follows:

17 **THE BELOW INFORMATION SHALL BE DESIGNATED AS**
 18 **"CONFIDENTIAL" UNDER THE PARTIES PROTECTIVE ORDER:**

19 Phone: US Phone: +1 415 987-4788; AU Phone: +61 461 592 278 (note that potentially
 20 relevant communications were made on Defendant's US phone, but could be viewed on
 21 Defendant's Australian phone)

22 Social Media/Blogs: None

23 Email: lchambers@mozilla.com; lpeile@gmail.com

25 **RESPONSE TO REQUESTS FOR PRODUCTION**

26 **REQUEST FOR PRODUCTION NO. 1:** All Communications that mention or relate to Plaintiff
 from May 1, 2022 to the present in each account listed in response to Interrogatory No. 1, excluding

1 accounts associated with your employment with Mozilla.

2 **RESPONSE TO REQUEST NO. 1:**

3 Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably
4 tailored or proportional to the needs of this case insofar as it seeks information that is not relevant
5 to any party's claims or defenses. In particular, communications that merely mention or relate to
6 Plaintiff are over encompassing and will not necessarily relate to claims or defenses. Defendant
7 objects to this Request on the grounds that it seeks information protected by the attorney-client
8 privilege, work-product doctrine, and/or other applicable privileges. Defendant also objects to
9 this Request on the grounds that it seeks documents containing information pertaining to
10 individuals, the disclosure of which would constitute a violation of any individual's right of
11 privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional,
12 statutory, or common law right of privacy. Without waiving the objections, Defendant responds
13 as follows:

14 Defendant will agree to produce non-privileged communications in its possession to or
15 from Defendant's non-Mozilla accounts that mention or relate to Plaintiff from May 1, 2022 to
16 the present that contain search terms agreed to by Plaintiff and Defendant.

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1 Dated this 10th day of September, 2024
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DLA PIPER LLP (US)

3 By: s/ Anthony Todaro

4 Anthony Todaro, WSBA No. 30391

5 s/Alexandria Cates

6 Alexandria Cates, WSBA No. 53786

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Attorneys for Defendants *MOZILLA*
CORPORATION a.k.a M.F.
TECHNOLOGIES, LAURA CHAMBERS,
WINIFRED MITCHELL BAKER, and
DANI CHEHAK

CERTIFICATION

The undersigned attorneys for Defendant Laura Chambers have read the foregoing Interrogatories and Requests for Production, and Defendant's answers and responses thereto, and states that they are in compliance with applicable Federal Rules of Civil Procedure and the Local Rules of the Western District of Washington, this 10th day of September, 2024.

s/ Anthony Todaro

Anthony Todaro, WSBA No 30391
Alexandria Cates, WSBA No. 53789
Attorneys for Defendants Mozilla Corporation,
Laura Chambers, Winifred Michell Baker, and
Dani Chehak

VERIFICATION

I, Laura Chambers, declare under penalty of perjury under the laws of the State of Washington that I have read the foregoing answers and responses to Plaintiff's First Set of Interrogatories and all of the answers and responses are true and correct to the best of my knowledge and belief.

DECLARED this 12 day of September, 2024.

Signed by:
laura Chambers
BF208E1752E2449
Laura Chambers

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2024, I caused a true and correct copy of the foregoing to be served on the following in the manner indicated:

<p>Amy Alexander Mathew Harrington STOKES LAWRENCE, P.S. 1420 Fifth Avenue, Suite 3000 Seattle, WA 98101-2393 Telephone: (206) 626-6000 Fax: (206) 464-1496</p>	<p><input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email <input type="checkbox"/> Via the Court's CM/ECF System</p>
<p><u>Amy.alexander@stokeslaw.com</u> <u>Mathew.Harrington@stokeslaw.com</u> <u>laura.smith@stokeslaw.com</u> <u>sarah.armon@stokeslaw.com</u> <u>Maricarmen.Perez-Vargas@stokeslaw.com</u> <u>anna.armitage@stokeslaw.com</u></p>	
<p><i>Attorneys for Plaintiff Steve Teixeira</i></p> <p>Darren A. Feider Amanda V. Masters SEBRIS BUSTO JAMES 15375 SE 30th Pl., STE 310 Bellevue, Washington 98007 <u>dfeider@sbj.law</u> <u>amasters@sbj.law</u> <u>epruzinsky@sbj.law</u> <u>kmarchenko@sbj.law</u></p> <p><i>Attorneys for Defendant Mozilla Foundation</i></p>	<p><input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email <input type="checkbox"/> Via the Court's CM/ECF System</p>

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 10th day of September, 2024.

s/ Jacey Bittle
Jacey Bittle, Legal Administrative Assistant